

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of

Telecommunications Carriers Eligible to
Receive Universal Service Support,

PlatinumTel Communications, LLC Petition for
Designation as an Eligible Telecommunications
Carrier for Low Income Support Only

WC Docket No. 09-197

**PETITION OF PLATINUMTEL COMMUNICATIONS, LLC
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
FOR LOW INCOME SUPPORT ONLY**

Thomas H. Rowland
Kevin D. Rhoda
ROWLAND & MOORE LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654
(312) 803-1000
tom@telecomreg.com
krhoda@telecomreg.com

Counsel for PlatinumTel Communications, LLC

Dated: August 5, 2011

SUMMARY

PlatinumTel Communications, LLC (“PlatinumTel”) has been providing prepaid wireless telecommunications services to low income consumers throughout the United States since 2001, making it one of the earliest pioneers in prepaid wireless. In 2009 PlatinumTel was certified as an ETC in Illinois. PlatinumTel operates through a combination of resale throughout its service area as well as facilities that it owns in Illinois. PlatinumTel respectfully submits this Petition for designation as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (“Act”).¹ PlatinumTel seeks ETC designation exclusively for low income support in the non-rural areas of Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia (collectively, the “Designated Service Area”). PlatinumTel does not seek, and will not accept, High Cost support in any part of the Designated Service Area.

PlatinumTel provides prepaid wireless service to customers from lower income backgrounds who generally do not have wireless service because of economic constraints, poor credit history or an inability to enter into a long-term contract. PlatinumTel does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Prepaid wireless services have become essential for lower-income customers, providing them with affordable wireless access, including access to emergency services and a reliable means of accessing contacts for family, prospective employers or social services agencies.

PlatinumTel provides prepaid wireless telecommunications services to consumers by reselling the services of Sprint PCS, which provides wholesale capacity to wireless resellers. Sprint PCS will provide PlatinumTel with the network infrastructure and wireless transmission facilities, allowing PlatinumTel to operate as a Mobile Virtual Network Operator (“MVNO”). As an MVNO, PlatinumTel purchases wireless services from the underlying carrier on a wholesale basis for calling, text messaging,

¹ 47 U.S.C. §214(e)(6).

broadband and resells those services to customers using its own brand. PlatinumTel's value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly packages of minutes in advance. Through its contracts with underlying carriers, PlatinumTel has the ability to offer all of the services and functionalities supported by the USF and set forth in Section 54.101(a) of the Commission's rules. PlatinumTel respectfully requests that the Commission promptly approve the instant request for ETC designation to enable PlatinumTel to rapidly provide Lifeline and Linkup services to qualifying customers in the Designated Service Area.

TABLE OF CONTENTS

I.	Overview of PlatinumTel.....	2
II.	PlatinumTel Meets the Requirements for ETC Designation.....	4
A.	The Relevant State Public Utility Commissions have Asserted that they Lack Jurisdiction.....	5
B.	PlatinumTel is a Common Carrier.....	5
C.	PlatinumTel Provides the Core Services Required to Qualify for Universal Service Support.....	5
D.	PlatinumTel Will Comply with Advertising Rules and Requirements.....	8
E.	PlatinumTel will Provide the Services Throughout the Proposed Designated Service Area.....	9
F.	PlatinumTel will Remain Functional in Emergencies.....	9
G.	PlatinumTel will Satisfy Applicable Consumer Protection and Service Quality Standards.....	9
H.	PlatinumTel's Calling Plans Offer Local Usage Comparable to the Relevant ILECs' Plans.....	10
I.	PlatinumTel Acknowledges that the Commission May Require it to Provide Equal Access Under Certain Circumstances.....	10
J.	PlatinumTel will Comply with Consumer Eligibility Certification and Verification Rules, Adopt Recent Related Commitments and Work to Eliminate Any Duplicates.....	10
K.	PlatinumTel will Continue its Sixty Day Inactivity Policy.....	11
L.	PlatinumTel will Ensure Continued Access to 911/E911.....	12
III.	Designating PlatinumTel as an ETC is in the Public Interest.....	12
IV.	Anti-Drug Abuse Certification.....	13
V.	Conclusion.....	14

In the Matter of	:	
	:	
	:	
	:	
	:	WC Docket No. 09-197
Telecommunications Carriers Eligible to	:	
Receive Universal Service Support,	:	
	:	
PlatinumTel Communications, LLC Petition for	:	
Designation as an Eligible Telecommunications	:	
Carrier for Low Income Support Only	:	
	:	
	:	
	:	

PlatinumTel Communications, LLC (“PlatinumTel”) respectfully submits this Petition for designation as an eligible telecommunications carrier (“ETC”) pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (“Act”)² and Section 54.201 *et seq.* of the Commission’s rules³. PlatinumTel seeks ETC designation for Lifeline/Link Up (i.e., low income support) in the non-rural areas of the following states: Alabama, Connecticut, Delaware, District of Columbia, Florida, New Hampshire, New York, North Carolina, Tennessee and Virginia (collectively, the “Designated Service Area”). PlatinumTel does not seek, and will not accept, High Cost support in any part of the Designated Service Area.

³ 47 C.F.R. §54.201.

I. Overview of PlatinumTel

PlatinumTel has been providing prepaid wireless telecommunications services to low income consumers throughout the United States since 2001, making it one of the earliest pioneers in prepaid wireless. In 2009, PlatinumTel was certified as an ETC in Illinois. PlatinumTel operates through a combination of resale throughout its service area as well as facilities that it owns in Illinois. Those facilities, which include routers and a soft switch, allow PlatinumTel to provide its customers international calling and operator services such as 411 and 611.

Through its experience, PlatinumTel recognized that there was growing demand from the customer base for prepaid wireless services as low income consumers, left with fewer choices, were looking to spend their limited telecommunications budgets on wireless services that would afford them mobility and always available service. As a result, PlatinumTel will expand its service offerings in order to serve the growing needs of Lifeline and Link Up eligible, low income consumers for a competitive, prepaid wireless service. The company expects to provide service to and receive ETC designation in other states during the next twelve months.

PlatinumTel provides prepaid wireless service to customers from lower income backgrounds who generally do not have wireless service because of economic constraints, poor credit history or an inability to enter into a long-term contract. PlatinumTel does not impose credit checks or long-term service contracts as a prerequisite to obtaining service. Prepaid wireless services have become essential for lower-income customers, providing them with affordable services, access to emergency services, and a reliable means of contact for family members, prospective employers or social services agencies. PlatinumTel will expand access to wireless services by providing affordable wireless plans and quality customer service to consumers who are otherwise unable to afford them and were previously ignored by traditional carriers.

PlatinumTel provides prepaid wireless telecommunications services to consumers by reselling the services of Sprint PCS, which provides wholesale capacity to wireless resellers. Sprint PCS provides PlatinumTel with the network infrastructure and wireless transmission facilities, allowing PlatinumTel to operate as a Mobile Virtual Network Operator ("MVNO"). As an MVNO, PlatinumTel purchases wireless services from the underlying carrier on a wholesale basis for calling, text messaging and broadband and resell those services to customers using its own brand. PlatinumTel operates, manages and markets all aspects of the customer experience, including in-house US based customer service, 411 directory assistance, IT services, pricing, the PlatinumTel website, handset procurement, handset logistics, handset selection, service offerings, entertainment applications and marketing materials. PlatinumTel's simple and straightforward prepaid pricing, along with its differentiated services offerings and high-quality customer service, sets the standard for the prepaid wireless market. PlatinumTel's value proposition enables customers to select among an array of flexible service plans that allow them to pay for minutes as they use them or purchase monthly packages of minutes in advance. PlatinumTel currently offers the most affordable as you go wireless program in the United States.

On July 2, 2010, PlatinumTel filed a petition seeking forbearance consistent with prior decisions for similarly situated MVNOs.⁴ As described above, PlatinumTel owns facilities in Illinois, including, but not limited to routers and a soft switch. Those facilities allow PlatinumTel to serve its CMRS customers with international calling as well as directory services such as 411 and 611. Although PlatinumTel believes that ownership of such facilities for the provision of those services satisfies the §214(e)(1) facilities requirement, it nevertheless filed its Forbearance Petition to the extent the Commission or a state PUC determined that PlatinumTel's facilities in Illinois were not compliant with the facilities requirement on a service area wide basis.

⁴ *In the Matter of Federal-State Joint Board on Universal Service*, Petition for Forbearance of PlatinumTel Communications, LLC, WC Docket No. 09-197 (July 2, 2010).

As described below, through its contracts with underlying carriers, PlatinumTel has the ability to offer all of the services and functionalities supported by the USF and set forth in Section 54.101(a) of the Commission's rules. PlatinumTel respectfully requests that the Commission promptly approve the instant request for ETC designation, along with its Petition for Forbearance, to enable PlatinumTel to rapidly provide Lifeline and Link Up services to qualifying customers in the Designated Service Area.

II. PlatinumTel Meets the Requirements for ETC Designation.

Pursuant to Section 214(e)(1) of the Act, a telecommunications carrier may be designated as an ETC and thereby receive universal service support if the carrier, throughout its service areas: (a) offers the services that are supported by federal universal service support mechanisms under §254(c) of the Act, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including services offered by another ETC); and (b) advertises the availability of and charges for such services using media of general distribution. With respect to the §214(e) facilities requirement, the FCC has stated:

We conclude, therefore, that, if a carrier uses its own facilities to provide at least one of the designated services, and the carrier otherwise meets the definition of 'facilities' adopted above, then the facilities requirement of section 214(e) is satisfied. For example, we conclude that a carrier could satisfy the facilities requirement by using its own facilities to provide access to operator services, while providing the remaining services designated for support through resale.⁵

As noted above, although PlatinumTel believes it's ownership of facilities in Illinois satisfies the facilities requirement, through its Petition for Forbearance, PlatinumTel seeks authority to provide the supported services through resale to the extent the Commission or a PUC determined the PlatinumTel facilities do not comply with the §214(e)(1) standard on a service area wide basis.

Section 54.201(b) of the FCC's Rules states that the Commission shall, on its own motion or upon request, designate a common carrier an ETC so long as the carrier meets the requirements of

⁵ *Federal-State Joint Board on Universal Service, Report and Order*, 12 FCC Rcd 8776, 8870-71 (1997); See also *Id.* at 8871 ("[S]ection 214(e) does not mandate the use of any particular level of a carrier's own facilities.").

Section 54.201(d), which restates the requirements found in Section 214(e)(1) of the Act. Section 214(e)(2) of the Act and Section 54.201(c) of the FCC's Rules state that the Commission may, in the case of an area serviced by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an ETC for a service area the Commission designates, provided each additional requesting carrier satisfies Section 214(e)(1) of the Act and Section 54.201(d) of the FCC's Rules. Before designating an additional ETC for an area serviced by a rural telephone company, the Commission shall find that such designation is in the public interest.

A. The Relevant State Public Utility Commissions have Asserted that they Lack Jurisdiction.

Each state subject to this Petition has asserted that it lacks jurisdiction over the wireless services that PlatinumTel seeks to provision as an Eligible Telecommunications Carrier. PlatinumTel therefore seeks ETC designation from this Commission pursuant to Section 214(e)(6)⁶. Exhibit 1, attached to this Petition, contains relevant orders and/or examples of letters from those state commissions asserting to a lack of jurisdiction over wireless services.

B. PlatinumTel is a Common Carrier.

PlatinumTel seeks to serve consumers in the Designated Service Area through Commercial Mobile Radio Service ("CMRS"). Pursuant to 47 U.S.C. §332(c)(1)(A) of the Act, an entity providing CMRS is a common carrier.

C. PlatinumTel Provides the Core Services Required to Qualify for Universal Service Support.

Pursuant to Section 54.101(a) of the FCC's Rules, the following core services and functions are to be offered by an ETC and should be supported by federal universal support mechanisms:

a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an

⁶ 47 U.S.C. §214(e)(6).

incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;

PlatinumTel provides voice grade access to the public switched telephone network ("PSTN") through its provision of resold CMRS. Bandwidth for this voice-grade access is at a minimum between 300 and 3,000 MHz, as required by the Commission's rules.

b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;

The FCC has determined that a carrier satisfies the local usage requirement if it offers customers rate plans that contain varying amounts of local usage.⁷ PlatinumTel offers a variety of rate plans that provide its customers with local usage on a per minute or per month rate. PlatinumTel further commits to complying with any future minimum local usage requirements adopted by the FCC.

c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;

PlatinumTel provides dual tone multi-frequency ("DTMF") signaling to expedite the transmission of call set up and call detail information throughout the network. All wireless handsets offered by PlatinumTel are DTMF-capable.

d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;

PlatinumTel provides single party service to its customers for the duration of each telephone call and does not provide multi-party services.

⁷ *Farmers Cellular, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 18 FCC Rcd 3848, 3852 (2003); *Pine Belt Cellular, Inc. and Pine Belt PCS, Inc.*, CC Docket No. 96-45, Memorandum Opinion and Order, 17 FCC Rcd 9589, 9593 (2002).

e) Access to emergency services. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911" to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;

PlatinumTel provides access to both 911 and E911 services to the extent local governments have implemented such services. PlatinumTel will provide access to 911 service and meet all requests for access to E911 service through local public service answering points ("PSAPs"), including forward automatic numbering ("ANI") and automatic location information ("ALI") to PSAPs as appropriate.

f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;

PlatinumTel provides access to its customers to its own in-house U.S. based operator services.

g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

PlatinumTel customers are able to make interexchange, i.e., long distance telephone calls.

h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings; and

PlatinumTel provides customers access to directory assistance services from their wireless handsets.

i) Toll limitation for qualifying low-income consumers.

PlatinumTel meets this requirement by offering service on a prepaid basis, as well as toll control for international calls. PlatinumTel's nationwide calling plans do not distinguish between local or toll services for domestic calls. As the FCC found in *In Re Virgin Mobile USA, L.P. Petition for Forbearance from 47 U.S.C. §214(e)(1)(A)*, Order, 24 FCC Rcd. 3381, 3394 at ¶134 (March 5, 2009), "the prepaid nature of [a prepaid wireless carrier's] service offering works as an effective toll control." Additionally, PlatinumTel will provide traditional toll control for international calls to qualifying low income consumers at no additional charge. Finally, PlatinumTel customers have the ability to monitor their minute usage and balances from their handset, on-line, and/or customer pre-set alerts as an additional means of monitoring their expenditures.

D. PlatinumTel Will Comply with Advertising Rules and Requirements.

PlatinumTel will broadly advertise the availability of and rates using media of general distribution as required by Section 54.201(d)(2) of the Commission's rules.⁸ PlatinumTel will advertise the general availability of, and charges for, the supported services listed above to all telecommunications customers in the Designated Service Areas.⁹ PlatinumTel will place those advertisements in a media of general distribution that specifically targets low-income customers including newspapers, mail advertisements, radio, television, direct mail, and community outreach organizations.

⁸ 47 C.F.R. §54.201(d)(2).

⁹ See, for example, Exhibit 2, a copy of PlatinumTel's advertising for its lifeline offering in Illinois. Care Wireless is a service offered by PlatinumTel.

E. PlatinumTel will Provide the Services Throughout the Proposed Designated Service Area.

PlatinumTel will provide service immediately using its standard customer equipment if a request is made by a potential customer within PlatinumTel's existing network coverage. If a potential customer requests service within PlatinumTel's Designated Service Area, but outside its existing network coverage, PlatinumTel will follow the six-step process specified in 47 C.F.R. §54.202(a)(1)(i). PlatinumTel will determine if service can be provided at reasonable cost by: (i) modifying or replacing the requesting customer's equipment; (ii) deploying a roof-mounted antenna or other equipment; (iii) adjusting the nearest cell tower; (iv) adjusting network or customer facilities; (v) reselling services from another carrier's facilities to provide service; or (vi) employing, leasing or constructing an additional cell site, cell extender, repeater, or other similar equipment. Because PlatinumTel seeks only low-income support, as opposed to high-cost funding to support the construction of network facilities, it is not submitting a network improvement plan under 47 C.F.R. §54.202(a)(1)(ii).

F. PlatinumTel will Remain Functional in Emergencies.

PlatinumTel commits to remaining functional in emergency situations. As described above, as an MVNO, PlatinumTel has sought forbearance from enforcement of the facilities requirement to permit its designation as an ETC. Through its contracts with underlying carriers, PlatinumTel has the ability to offer all of the services and functionalities supported by the USF and set forth in Section 54.101(a) of the Commission's rules. With respect to resold services provided by underlying carriers, those carriers are large, national carriers that are subject to regulatory requirements to remain functional in emergencies.

G. PlatinumTel will Satisfy Applicable Consumer Protection and Service Quality Standards.

Pursuant to 47 CFR §54.202(a)(3), an ETC applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. PlatinumTel will comply with all applicable state and federal consumer protection and service quality standards in its Designated Service Area, as well as the CTIA Consumer Code for Wireless Service.

H. PlatinumTel's Calling Plans Offer Local Usage Comparable to the Relevant ILECs' Plans.

Pursuant to 47 CFR §54.202(a)(4), an ETC applicant must demonstrate that it offers a local usage plan comparable to the one offered by the incumbent LEC in the service areas for which it seeks designation. PlatinumTel's wireless minutes may be used to call anywhere in the United States (i.e., local and long distance). PlatinumTel's offerings will therefore be more attractive than the ILEC calling plans, because PlatinumTel is offering a nationwide calling plan, in addition to mobility and additional features. In fact, PlatinumTel offers the most affordable "pay-as-you-go" wireless offering in the nation.

PlatinumTel's lifeline offering includes a free wireless phone, two hundred and fifty (250) free minutes each month (or 625 text messages) and features, including voicemail, caller ID, 3-way calling and nationwide long distance.

I. PlatinumTel Acknowledges that the Commission May Require it to Provide Equal Access Under Certain Circumstances.

Pursuant to 47 CFR §54.202(a)(5), an ETC applicant must certify its acknowledgement that the FCC may require it to "provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area." PlatinumTel acknowledges that it may be required to provide equal access to long distance carriers to all its customers in its designated service area.

J. PlatinumTel will Comply with Consumer Eligibility Certification and Verification Rules, Adopt Recent Related Commitments and Work to Eliminate Any Duplicates.

PlatinumTel will comply with the Commission's requirements for determining consumers' eligibility to participate in the low income program as well as annually verify customer eligibility as described in 47 CFR §54.410. In addition to following the specific requirements listed in the rule, PlatinumTel commits to require each customer in the Designated Service Area to (i) self-certify at the time of service activation and annually thereafter, that he or she is the head of household and receives low income supported service only from PlatinumTel; (ii) establish safeguards to prevent its customers

from receiving multiple low income subsidies at the same address, (iii) deal directly with the customer to certify and verify the customer's initial and continued eligibility, (iv) and certify annually that PlatinumTel is in full compliance with any applicable 911/E911 obligations, including obligations related to the provision and support of 911 and E911 service for each of the states in the Designated Service Area.

PlatinumTel will clearly indicate that customers execute their low income certification forms under penalty of perjury, and will monitor its low income customers' stated primary residential address to prevent duplicate support. PlatinumTel will maintain the customer's self-certification and provide copies of the certifications to the Commission upon request. PlatinumTel will deal directly with customers to certify and verify the customer's eligibility.

In order to eliminate duplicate support to the extent possible, PlatinumTel will provide to the state PUCs in the Designated Service Area state-specific customer data, including name and address for the purpose of permitting the PUC to determine whether a PlatinumTel customer improperly receives low income service from another carrier. PlatinumTel will promptly investigate any notification that it receives from a state PUC that one of its customers is improperly receiving low income service and immediately deactivate such customer's low income service and will no longer report that customer on its 497 reports. Finally, PlatinumTel will comply with all applicable rules adopted by the Commission in its recent *Lifeline and Link Up Reform and Modernization Report and Order*.¹⁰

K. PlatinumTel will Continue its Sixty Day Inactivity Policy.

With respect to its Illinois ETC authority, PlatinumTel has an established policy in which it de-enrolls any low income customer who has not used his or her phone for 60-days and who has not responded to PlatinumTel's repeated attempts to verify the legitimacy of the customer's participation in the low income program. PlatinumTel will notify the customer immediately that the customer is no

¹⁰ *In the Matter of Lifeline and Link Up Reform and Modernization*, Report and Order, WC Docket No. 11-42, CC Docket No. 96-45, WC Docket No. 03-109, FCC 11-97 (rel., June 21, 2011).

longer eligible for low income service unless the customer takes steps to re-enroll within a 30-day grace period if it appears that a prepaid low income customer's account has not been used for 60-days. During this period the customer's account will remain active while PlatinumTel attempts to determine whether the customer's service is compliant. PlatinumTel will altogether deactivate services for that customer if there is no evidence that the customer has used its service (such as by not making or receiving a call). If the customer is de-enrolled, PlatinumTel will not seek to recover any federal low income funding for service provided to the customer during the grace period and will not list that customer on its FCC Form 497 filed with the USAC unless the customer re-enrolls. PlatinumTel will maintain this policy in the Designated Service Area, in addition to any further policies as directed by the Commission or the relevant state PUCs.

L. PlatinumTel will Ensure Continued Access to 911/E911.

PlatinumTel will provide its low income customers with 911 and E911 access where appropriate, regardless of the customer's activation status and availability of prepaid minutes. PlatinumTel will provide E911-compliant handsets to all its low income customers, including replacing any handsets found to be non-compliant.

III. Designating PlatinumTel as an ETC is in the Public Interest.

Designation of PlatinumTel as an ETC will serve the overall public interest, and will particularly benefit low income customers in the Designated Service Area. The primary purpose of universal service is to ensure that consumers - especially low income consumers - receive affordable telecommunications services that are comparable to those enjoyed by other consumers. PlatinumTel offers voice service at affordable rates to economically disadvantaged customers who desire affordable wireless services. PlatinumTel plays a critical role in the marketplace by ensuring that Americans who cannot qualify for or afford other carriers' services can still enjoy the benefits of wireless telecommunications. Through this Petition, PlatinumTel seeks to make it easier for low income consumers located within the Designated

Service Area to access wireless service, along with features and functions, including voice mail and text messaging.

Granting PlatinumTel ETC status for low income support related to its wireless offerings will promote additional deployment of PlatinumTel's offerings to the Designated Service Area. PlatinumTel offers quality service at affordable prices, and adds another choice of provider for customers in the Designated Service Area. The inclusion of unlimited domestic toll calling as a part of PlatinumTel's wireless offering will allow consumers to avoid the risk of becoming burdened with large and unexpected charges for the toll calling and unexpected overage charges.

Additionally, ETC status will allow PlatinumTel to offer service to many low income customers who may not have service but for the Company. ETC status will allow low-income customers access to quality telecommunications service in the Designated Service Area. Because PlatinumTel's service is provided with no credit check, deposit requirement, minimum service periods, or early termination fees, the service will be an attractive and affordable alternative to qualified low-income consumers without regard to age, residency or creditworthiness. The wireless service offered by PlatinumTel will provide consumers with a convenient and affordable alternative to traditional telecommunications service that can be used on a mobile basis. Finally, wireless services have become essential for lower-income citizens, providing convenient, mobile, access to the telephone network, including emergency services. Providing PlatinumTel with the authority necessary to offer discounted Lifeline and Link-Up services to those consumers located in the Designated Service Area most in danger of losing wireless service altogether promotes the primary purpose of universal service and the overall public interest.

IV. Anti-Drug Abuse Certification

PlatinumTel certifies that no party to this Petition is subject to denial of federal benefits, including FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

V. Conclusion

As discussed above, designation of PlatinumTel as an ETC in the Designated Service Area accords with the requirements of Section 214(e)(6) of the Act and is in the public interest. For all of the foregoing reasons, PlatinumTel respectfully requests that the Commission designate PlatinumTel as an ETC in each of the states comprising the Designated Service Area.

Dated: August 5, 2011

Respectfully submitted,

s/ Thomas H. Rowland
Thomas H. Rowland
Kevin D. Rhoda
Rowland & Moore LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654
tom@telecomreg.com
krhoda@telecomreg.com
(312) 803-1000
(312) 803-0953 (facsimile)

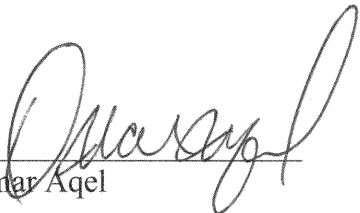
Counsel for PlatinumTel Communications, LLC

STATE OF ILLINOIS)

COUNTY OF COOK)

Verification

I, Omar Aqel, being first duly sworn, depose and state that I am Chief of Operations for PlatinumTel Communications, LLC and that I have read the foregoing Petition for Designation as an Eligible Telecommunications Carrier and know the contents thereof and the statements therein contained are true, to the best of my knowledge, information and belief.


Omar Aqel

PlatinumTel Communications, LLC

Subscribed and Sworn
to before me this 5th
day of August 2011.



